



DOE/EA 1431

Mitigation Action Plan
for the
Proposed Los Alamos National Laboratory Trails
Management Program

Department of Energy
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico

**MITIGATION ACTION PLAN
FOR THE
LOS ALAMOS NATIONAL LABORATORY
TRAILS MANAGEMENT PROGRAM**

Background Information: The U. S. Department of Energy (DOE), National Nuclear Security Administration (NNSA) has issued a Finding of No Significant Impact (FONSI) and a Final Environmental Assessment (EA) (*Final Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico, DOE/EA-1431*) on a proposal to establish and implement a management program for the continued use of social trails at Los Alamos National Laboratory (LANL), Los Alamos, New Mexico. The NNSA is concurrently issuing this Mitigation Action Plan (MAP) and now plans to implement the LANL Trails Management Program (the Program).

As described in the subject EA, the LANL Trails Management Program would be implemented in a step-wise fashion through individual projects. These project steps would include: Individual Project Planning Measures; Repair and Construction Measures; Environmental Protection Measures; Safety Measures; Security Measures; and End-State Conditions and Post-Repair or Post-Construction Assessment. Long-term maintenance measures would be followed to support the desired end-state condition of each trail, and each trail would be reviewed about every five years or as needed to determine what, if any, further measures are needed. As part of the Individual Project Planning Measures, a standing LANL Trails Assessment Working Group would be formed. This Trails Assessment Working Group would minimally include LANL staff and NNSA staff, augmented by invited representatives from the Incorporated County of Los Alamos, Bandelier National Monument, the Santa Fe National Forest, and the four Accord Pueblos; these invited representatives would participate in the Trails Assessment Working Group at their own discretion. Other individuals and entities may be invited to participate in the planning or implementation of individual trail projects on an ad hoc basis as the need arises and is identified by the Trails Assessment Working Group.

Function of the Mitigation Action Plan: The function of this Mitigation Action Plan (MAP) is to document potential adverse environmental effects that could result from site activities as a result of implementing this Program, to identify commitments made to mitigate those effects, to establish Action Plans to carry out each commitment, and to identify responsible NNSA or LANL organizations.

Environmental Effects: The EA and FONSI indicate that potential adverse effects of the Proposed Action under normal conditions would be minimal. The EA, however, includes certain project provisions within the analysis of the environmental effects of the proposed Trails Management Program to mitigate any potential adverse effects that could result from future site activities that are related primarily to trails repair, maintenance, and construction or associated activities.

Potential adverse environmental effects are as follows:

- (1) Trails maintenance, repair, construction and associated activities within LANL may adversely affect potential habitat for Federally threatened or endangered species, such as the Mexican spotted owl.
- (2) Trails maintenance, repair, construction, and associated activities within LANL may also adversely affect cultural resources located within or near LANL boundaries.
- (3) Trails maintenance, repair, construction, and associated activities within LANL may also adversely affect areas of concern for legacy contamination.

Commitments To Mitigate Adverse Environmental Effects: NNSA's commitment to mitigate the possibility for adverse site effects from implementing the LANL Trails Management Program related to potential sensitive habitats, cultural resources, or contaminant spread, shall be included within the LANL Integrated Natural and Cultural Resource Management Plan (the Integrated Management Plan or IRMP), Environmental Protection Programs (EPPs) as a part of LANL's overarching Integrated Safety Management System (ISMS). Natural and cultural resource management plans supporting the IRMP are currently scheduled for completion by no later than 2005.

Mitigations for adverse environmental effects will take the form of natural and cultural resource surveys, evaluations, sample and data recovery actions, and necessary reports and consultation efforts. Additionally, the mitigations will include the establishment of a public outreach and information project element not specifically identified in the subject EA.

Action Plans and Responsible Parties: Specific Action Plans to be conducted will be identified through the LANL Trails Management Program's individual project planning measures, identification of sensitive resource issues step for each trails project. As explained later in the text of this MAP, as Action Plans are determined for each project, the MAP will be amended to include these specific project actions to be undertaken.

The NNSA, Los Alamos Site Office Manager will have the overall responsibility for insuring the adequate and timely completion of all actions associated with the MAP. The LANL Associate Director of Operations (ADO), as a LANL University of California Management and Operations (M&O) contractor representative, will be responsible for conducting the mitigation measures performed by their personnel (or sub-contractors) and conducting project specific activities identified for each trail; the LANL Risk Reduction Environmental Stewardship-Ecology (RRES-ECO) Group Leader will be responsible for data collection and monitoring activities.

Mitigation Action Plan Annual Report: Activities associated with the MAP will be reported in a NNSA Mitigation Action Plan Annual Report (MAPAR) to be issued by January 31st of each year for the preceding LANL fiscal year (October through September), beginning one year after the implementation of the LANL Trails Management Program; implementation of the LANL Trails Management Program is expected to commence at the beginning of the LANL 2004 fiscal year. The MAPAR will be continued annually thereafter until all existing LANL trails have undergone review and associated actions have been completed and reported on; the MAPAR may then be suspended until such time that new or follow-on actions are identified as being required and then the MAPAR may be resumed as needed.

The MAPAR will reflect new information or changed site circumstances. If major changes to mitigations identified in project-specific action plans or the MAP are necessary, these changes will be reflected in the MAPAR. The

MAPAR will be placed in the Los Alamos and the Albuquerque DOE Public Reading Rooms for public and stakeholder information.

A Mitigation Tracking System (MTS) will be developed to document the progress of fulfilling commitments described in the MAP. Results of the MTS will be reported in the MAPAR. The MTS will continue until all individual project mitigation commitments are approved, verified and are considered closed. A completion Report will be issued by the NNSA at the time of completion of all mitigation. NNSA will approve and verify progress or closure on mitigation measures and evaluate the success of various mitigation measures over time. These efforts will be reported, as appropriate in the MAPAR.

The MAPAR may be prepared in the form of a letter report. The complexity of the report document will be expected to reflect the extent of and complexity of the mitigations.

MAP Amendments: NNSA may amend this MAP at any time. As individual projects are planned, this MAP will be amended to include Albuquerque DOE Public Reading Rooms for public and stakeholder information.

Provisions of this MAP will be effective immediately.

September 2, 2003

MAP Authorization Date

Ralph EEO

Manager, Los Alamos Site Office